

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	)	Chapter 11
	)	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	)	Case No. 09-50026 (REG)
	)	
f/k/a General Motors Corp., <i>et al.</i>	)	
	)	
Debtors.	)	(Jointly Administered)
-----X	)	

**SUPPLEMENTAL DECLARATION  
OF DEAN M. TRAFELET IN SUPPORT OF MOTION PURSUANT TO SECTIONS 105  
AND 1109 OF THE BANKRUPTCY CODE FOR AN ORDER APPOINTING  
DEAN M. TRAFELET AS LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS**

I, Dean M. Trafelet, do declare and say the following:

1. I am over the age of 18 years, and am competent and otherwise qualified to make this Supplemental Declaration. Unless otherwise stated herein, I have personal knowledge of the facts set forth herein.

2. On March 9, 2010, the Debtors in the above-captioned case filed their *Motion Pursuant to Sections 105 and 1109 of the Bankruptcy Code for an Order Appointing Dean M. Trafelet as Legal Representative for Future Asbestos Personal Injury Claimants* (the "**Motion**"), seeking to have me appointed as the legal representative of future asbestos personal injury claimants against the Debtors (the "**Future Claimants' Representative**"). See Docket No. 5214. My declaration—the *Declaration of Dean M. Trafelet in Support of Motion Pursuant to Sections 105 and 1109 of the Bankruptcy Code for an Order Appointing Dean M. Trafelet as Legal Representative for Future Asbestos Personal Injury Claimants*—was attached thereto as Exhibit B. A hearing on the Motion was held on April 8, 2010 and an Order granting the Motion was entered by the Court on April 8, 2010. See Docket No. 5459.

3. This Supplemental Declaration is being provided to supplement the disclosures made in my previous declaration.

4. I currently serve as the Chairman of the Board of Delaware Claims Processing Facility, LLC ("**DCF**").

5. The Official Committee of Unsecured Creditors (the "**Creditors' Committee**") is seeking certain information from DCF through their *Motion of the Official Committee of Unsecured Creditors of Motors Liquidation Company for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents by (I) the Claims Processing Facilities for Certain Trusts Created Pursuant to Bankruptcy Code Section 524(g) and (II) General Motors LLC and the Debtors*. See Docket No. 6383.

6. My service as Chairman of the Board of the DCF does not relate to or involve, and will not relate to or involve, any matter concerning the Debtors in this case or any other matters relating to this case. More specifically, I will not have any role in or take part in any of the DCF's decisions regarding the Creditors' Committee's information requests or any other matters relating to the Debtors and their bankruptcy cases. I also serve in various capacities, for example, as future claimants' representative or trustee, for various trusts that may be subject to these or other information requests relating to the Debtors and their bankruptcy cases. In those instances, too, I will not have any role in or take part in any of those entities' decisions regarding the information requests or any other matters relating to the Debtors and their bankruptcy cases.

7. I do not believe that my services as Chairman of the Board of DCF, as future claimants' representative or trustee in various trusts create a disqualifying conflict as I do not hold an interest adverse to the Debtors or the Debtors' estates and I remain a disinterested person

as that term is defined in 11 U.S.C. § 101(14) of the Bankruptcy Code, for the purpose of serving as the Future Claimants' Representative in this chapter 11 case.

8. Except as disclosed herein and in my prior declaration in support of the Motion, to the best of my knowledge I do not have any connections with the Debtors, the Debtors' creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

9. I will continue to monitor my connections to the Debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee to ensure that no conflicts or other disqualifying circumstances exist or arise and will promptly file supplemental disclosures as needed.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on this 27 day of August 2010, in Chicago, Illinois

  
Dean M. Trafelet